

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

SHANNON PEREZ, HAROLD DUTTON, JR, §  
AND GREGORY TAMEZ §

Plaintiffs §

V. §

STATE OF TEXAS; RICK PERRY, In His §  
Official Capacity as Governor of the State of §  
Texas; DAVID DEWHURST, In His Official §  
Capacity as Lieutenant Governor of the State of §  
Texas, and JOE STRAUS, In His Official §  
Capacity as Speaker of the Texas House of §  
Representatives, HOPE ANDRADE, in Her §  
Official Capacity as Secretary of State of the §  
State of Texas §

Defendants §

CIVIL ACTION NO. 5:11-CV-0360-OLG

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE**  
**TO FILE SECOND AMENDED COMPLAINT**

TO THE HONORABLE COURT:

COME NOW, Shannon Perez, Harold Dutton, Jr. and Gregory Tamez ("Plaintiffs") and move for leave to file their Second Amended Complaint, previously tendered for filing, and for grounds, would show the court as follows:

**I.**  
**INTRODUCTION**

1. Plaintiffs are Shannon Perez, Harold Dutton, Jr. and Gregory Tamez; Defendants are the State of Texas, Rick Perry, David Dewhurst, Joe Straus and Hope Andrade.
2. Plaintiffs have sued defendants challenging the constitutionality of redistricting plans in the State of Texas.

**II.**

**AGREED REQUEST FOR LEAVE TO FILE AMENDED PLEADINGS**

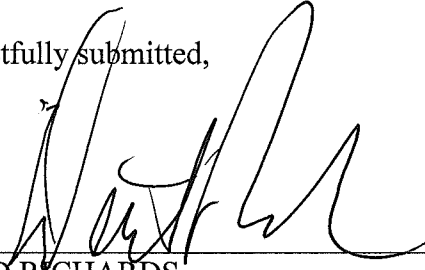
3. The Second Amended Complaint eliminates one of the claims previously asserted and its filing would serve the ends of justice. Counsel has conferred with attorneys for the Defendants and they have agreed to the filing of the Second Amended Complaint.

**III.**

**CONCLUSION**

For these reasons, Plaintiffs respectfully move the Court for an order directing the Clerk to accept and file Plaintiffs' Second Amended Complaint.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'David Richards', is written over a horizontal line.

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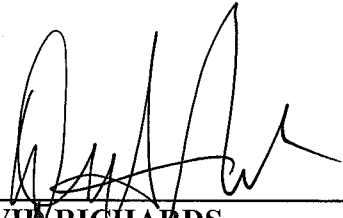
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**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent *via* the court's electronic notification system, on June 17, 2011, to the following:

David Schenck  
Deputy Attorney General of Legal Counsel  
P.O. Box 12548  
Austin, Texas 78711-2548  
Attorney for Defendants

  
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**DAVID RICHARDS**